## **BakerHostetler**

USDC SDNY	
DOCUMENT	
ELECTRONICALLY FILED	
DOC #:	070
DATE FILED:	11/11/2024

## MEMO ENDORSED

November 8, 2024

## Baker&Hostetler LLP

45 Rockefeller Plaza New York, NY 10111

T 212.589.4200 F 212.589.4201 www.bakerlaw.com

Justin A. Guilfoyle direct dial: 212.589.4607 jguilfoyle@bakerlaw.com

## **VIA ECF**

The Honorable Katharine H. Parker, U.S.M.J. United States District Court Southern District of New York 500 Pearl Street New York. New York 10007

Re: Quincy Nang, M.D., M.P.H. v. New York-Presbyterian Hospital

Docket No. 1:24-cv-4383-GHW-KHP

Dear Judge Parker:

This firm represents Defendant New York-Presbyterian Hospital in the above-captioned action. Defendant and Plaintiff Quincy Nang, M.D., M.P.H. (collectively, the "Parties") jointly write pursuant to Rule I.c. of Your Honor's Individual Practices in Civil Cases to request an adjournment of: (i) the Initial Case Management Conference currently scheduled for November 18, 2024; and (ii) the deadline for the Parties to submit the Report of Rule 26(f) Meeting and Proposed Case Management Plan, which is currently due on November 11, 2024 (Dkt. No. 19).

This matter was referred to mediation through the SDNY's Mediation Program (Dkt. No. 13), and a mediation had initially been scheduled for November 11, 2024. However, due to unavoidable scheduling conflicts, a new mediator had to be assigned to the case, and the mediation was rescheduled to December 17, 2024. Earlier today, the Parties had a conference with newly assigned mediator Michael Grenert, Esq. to discuss pre-mediation memorandum submissions and conferences and service of the Parties' Pilot Discovery Protocols in advance of the mediation.

The Parties respectfully request that the Initial Case Management Conference and the deadline to submit the Report of Rule 26(f) Meeting and Proposed Case Management Plan be adjourned to a date after December 17, 2024 so that the Parties can have the opportunity to participate in the mediation session without expending additional time and resources. There have been two previous requests for the instant relief (Dkt. Nos. 15 & 17), which were both granted by the Court (Dkt. Nos. 16 & 18).

The Parties thank the Court for its time and consideration of their request.

Respectfully submitted,

**BAKER & HOSTETLER LLP** 

/s/ Justin A. Guilfoyle
Justin A. Guilfoyle

Attorneys for Defendant

**MARKUS & SHERIDAN. LLP** 

/ s / Marc O. Sheridan Marc O. Sheridan

Attorneys for Plaintiff

Atlanta Cincinnati Cleveland Columbus Costa Mesa Dallas Denver Chicago Houston Washington, DC Los Anaeles New York Orlando Philadelphia San Francisco Seattle Wilmington Case 1:24-cv-04383-GHW-KHP Document 21 Filed 11/11/24 Page 2 of 2

APPLICATION GRANTED: The Initial Conference set for 11/18/2024 at 12:00 PM in Courtroom 17D, 500 Pearl Street, New York, NY 10007 is hereby rescheduled to <u>Tuesday</u>, <u>January 7, 2025 at 12:00 p.m.</u>
The deadline to submit the Report of Rule 26(f) Case Management Plan is extended to <u>December 18, 2024</u>.

**APPLICATION GRANTED** 

Kathaine H P

Hon. Katharine H. Parker, U.S.M.J.

11/11/2024